

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	No. 07 CR 752
)	07 GJ 1111
v.)	
)	
MOTTIO PASCHAL,)	Chief Judge James F. Holderman
)	

**GOVERNMENT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
RETURN INDICTMENT PURSUANT TO 18 U.S.C. § 3161(h)**

The UNITED STATES OF AMERICA, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, respectfully moves this Court pursuant to 18 U.S.C. § 3161(h)(8) for a forty-five (45) day extension of time from December 17, 2007, to and including January 31, 2008, in which to return an indictment against the defendant in this case. In support of this motion, the government states as follows:

1. This case involves two bank robberies. Defendant Paschal was arrested on November 14, 2007 outside one of the banks that was robbed.
2. On November 15, 2007, the government filed a criminal complaint charging the Defendant with bank robbery under 18 U.S.C. § 2113(a). On November 15, 2007, Paschal waived a preliminary hearing and bond. Defendant remains in custody.
3. The thirty days available to the government pursuant to Title 18, United States Code, Section 3161(b) in which to file an indictment or information against the defendant expires on Monday, December 17, 2007. The government seeks an extension from the expiration date, for 45 days to and including January 31, 2008. The government respectfully submits that a continuance for an additional 45 days is warranted in this case in order to permit further plea negotiations, to permit

the government the reasonable time necessary for effective preparation of the evidence for presentation to the grand jury and for the additional reasons set forth in the sealed attachment.

4. The undersigned attorney has consulted with counsel for the defendant, Michael Falconer, who does not oppose the extension of time.

WHEREFORE, the United States respectfully requests a 45-day extension of time from December 17, 2007, to and including January 31, 2008, in which to seek an indictment in this case.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By: s/ J. Gregory Deis
J. GREGORY DEIS
Assistant United States Attorney
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Dated: December 12, 2007

CERTIFICATE OF SERVICE

I, J. Gregory Deis, certify that on December 12, 2007, I caused the GOVERNMENT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RETURN INDICTMENT PURSUANT TO 18 U.S.C. § 3161(h): (1) to be filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division; and (2) a copy thereof mailed to:

Michael J. Falconer, Esq.
35 East Wacker Drive, Suite 650
Chicago, Illinois 60601

By: /s/ J. Gregory Deis
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